

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA

IN RE:

MERCY HOSPITAL, IOWA CITY,
IOWA, et al.,
Debtors.

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§
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Chapter 11

CASE NO. 23-00623(TJC)
(Jointly Administered)

AFFIDAVIT OF MICHAEL A. MCKEE, JR.

STATE OF OHIO }
COUNTY OF HAMILTON }Ss:
}

Affiant, Michael McKee, being duly cautioned and sworn, deposes and states the following.

1. I am over the age of eighteen, suffer from no legal disabilities, and have personal knowledge of all matters asserted herein.

2. On September 18, 2023 I submitted Proof of Claim No. 10066 (the "Claim") in this action on behalf of creditor Health Carousel Travel Network, LLC ("Health Carousel").

3. This Claim remains unpaid.

4. On April 9, 2025, in an attempt to resolve Debtor Mercy Hospital, Iowa City, Iowa ("Debtor"). Objection to the Claim, I contacted Marc Ross, the Trust's financial advisor, and provided him the account statement spreadsheet identifying all principal amounts owed by Debtor to Health Carousel.

5. Having not received any response to my initial contact, I contacted Mr. Ross on April 22, April 29, May 23, and May 28, 2025.

6. After attempting to contact Mr. Ross on June 23 and June 26, 2025, I conducted a zoom conference with Mr. Ross on July 2, 2025 where he requested that the spreadsheet attached

to the Claim be re-provided in excel format, which I provided that same day.

7. I contacted Mr. Ross on July 7 and again on July 23, 2025. Mr. Ross has only ever indicated to me that he was seeking additional information to evaluate Health Carousel's claim. He has never provided any reason why Health Carousel's claim is not owed.

8. I have not received any further information from Mr. Ross since July 23, 2025.

FURTHER AFFIANT SAYETH NAUGHT.



Michael A. McKee, Jr.
Health Carousel Travel Network, LLC

STATE OF OHIO }
 }Ss:
COUNTY OF HAMILTON }

BE IT REMEMBERED, that on this 29 day of August, 2025, before me, the subscriber, a Notary Public in and for said county, personally came Michael A. McKee, Jr., Health Carousel Travel Network, LLC's authorized agent, and acknowledged that he signed the foregoing instrument and that the signing thereof is his voluntary act and deed.

IN TESTIMONY THEREOF, I have hereunto subscribed my name and affixed my seal on this day and year aforesaid.



Notary Public



KATHRYN KAMPMANN
Notary Public
State of Ohio
My Comm. Expires
April 18, 2027